



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
1235 MISSION STREET
SAN FRANCISCO, CA 94103

N00296.000932
MOFFETT FIELD
SSIC NO. 5090.3

15 AUG 1990

Mr. Stephen Chao
Western Division Naval Facilities
Engineering Command
P.O. Box 727
San Bruno, California 94066-0720

Dear Mr. Chao:

Please find enclosed the Environmental Protection Agency's (EPA) comments to Naval Air Station Moffett Field 's (NASMF) Inferred Sources 8 & 9, Draft Workplan. EPA regards the workplan as a Field Sampling Plan (FSP) and was therefore reviewed as a FSP.

As stated in our enclosed general comment, the workplan should conform to EPA Region 9's guidance for preparing a FSP. The next iteration of the workplan, the draft final, should address the missing elements of an FSP. If you have any questions please contact me at (415) 744-1996.

Sincerely,

Lewis Mitani
Remedial Project Manager

enclosure

cc: distribution list

932

ADMIN RECORD

E/N 18

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Comments to Inferred Sources 8 and 9
Draft Workplan

General Comments

1. This workplan is a combined workplan and sampling plan for the proposed investigation. As such, all required elements of a Sampling and Analysis Plan must be included. The current EPA guidance document, Preparation of a U.S. EPA Region 9 Field Sampling Plan for Private and State-Lead Superfund Projects, April 1990, (Document Control No. 9QA-06-89), should be reviewed and missing elements as identified in the specific comments incorporated.

2. All waste waters and soils, including purge water, development water, decontamination water, and drill cuttings must be contained until it is determined if these materials are hazardous or may pose a threat to human health and the environment. The specific procedures and criteria for determining the ultimate disposition of waste waters and soil must be included.

Specific Comments

1. Page 7, paragraph 3.

The street names listed in this paragraph should be shown on the location figure.

2. Page 9, paragraph 3.

The regional groundwater flow direction should be shown on Figure 2, which should be referenced in this paragraph.

3. Page 9, paragraph 3.

An explanation for the size and shape of the inferred source areas, as identified on Figure 2, should be included.

4. Pages 12-16.

It is not clear from the text that data presented is the most recent available. Has water level data been collected more recently?

5. Page 17, last paragraph.

The location of the soil boring should be shown on a figure, or the well number which corresponds with the soil boring should be identified in the text.

6. Page 18, third paragraph.

Complete soil results should be included in an appendix which should be referenced in this section.

7. Page 35, last paragraph.

Plate 1.2-5 is missing.

8. Page 37, Section 2.4.2.1

Soil boring EB-32, which apparently corresponds with hole 78B1, which was not located within the defined source area, therefore it could not be determined if contamination was present in the source area. These facts should be reflected in the text. Soil boring 5C is not shown in a figure. The text of this section should be revised.

9. Page 40, Task 2.

Rationale for selection of the wells to be sampled should be included. Also, the rationale for eliminating key MEW wells from consideration should be discussed.

10. Page 40, last sentence.

In addition to measuring water levels prior to sampling, a separate task should be considered to obtain a "snapshot" of all water levels. Wells to be included in the water level measurement task should be indicated in the revised text.

11. Page 42, second paragraph.

Deliverables for Task 2 should include current water level maps for all aquifers.

12. Page 42, second paragraph.

The rationale for selection of TCE and TCA should be presented as well as the rationale for selection of the individual wells for which data will be displayed.

13. Page 42, paragraph 2.

Under specific deliverables for Task 2: second bullet is the same as the first.

14. Page 46.

The discussion regarding soil gas sampling should indicate which compounds are being tested for as well as the type of detector to be used and detection limits. If this is discussed later in the document, the appropriate section should be referenced here. QA/QC procedures and criteria for soil gas sampling should also be included or attached. The EPA QA/QC Level of soil gas samples, and the proposed use of that data with respect to the QA/QC Level should be presented.

15. Page 47, paragraph 1.

Standard procedures for CPT use should be included or attached.

16. Page 47, paragraph 2.

The analytical method and QA/QC procedures for the on-site laboratory should be discussed here or in section 5.0.

17. Page 47. paragraph 2.

The EPA QA/QC level for hydropunch samples analyzed at an on-site laboratory should be described. The anticipated use of the data should be discussed with respect to the QA level.

18. Page 48, first sentence.

The basis for the inferred limits of IS 8 and IS 9 should be stated.

19. Page 48, paragraph 2.

Contamination in the bottom most sample can not be routinely dismissed. Migration from the capillary fringe must be considered on a case by case basis. This sentence should be revised.

20. Page 48, paragraph 2.

The discussion of analyses to be performed should include the EPA Method numbers, or should reference a section in the document where this is discussed (e.g. Moffett's RI/FS QAPP).

21. Page 48, paragraph 2, last four words.

The sentence should be rephrased to indicate that soil types, not soil borings are identified. HPT should be CPT.

22. Page 49, paragraph.

The basis for the location, size, and shape of IS 8 and IS 9 as shown in the figures should be stated in the text, so that the reader can evaluate the proposed placement of borings and monitoring wells. Why is IS 9 larger than IS 8?

23. Page 51, first paragraph.

The EPA Method numbers should be stated, or a section containing that information referenced.

24. Page 55, last paragraph.

Samples for volatile analysis are generally collected in brass sleeves.

25. Page 56, paragraph 1.

Explain the procedure for compositing soil samples.

26. Page 58, section 4.3.3.3.

Purge water from well development must be contained. Add a method or procedure for containing the purge water to this section or reference a section where containment procedures are presented.

27. Page 61, paragraph 1, last sentence.

Purge water from well sampling must be contained. Please revise this sentence so that it is clear that the water will be contained.

28. Page 62, Paragraph 1.

U.S. EPA Region IX guidelines for decontamination must be followed. These decontamination procedures involve one DI rinse after tap water rinse, then pesticide grade solvent rinse (when semi-volatile or non-volatile organic contamination may be present), then double DI rinse followed by HPLC water rinse. The paragraph should be revised to reflect current guidance.

29. Page 62, Paragraph 2.

This section should discuss the procedures for containing decontamination fluids or reference an appropriate section. All decontamination fluids must be contained.

30. Page 69, Table 3.

This table suggests that cation analysis will be performed for soil samples. This was not discussed in the text. Please revise the text or the table.

31. Page 70, Table 4.

This table lists several types of analyses for water samples that were not discussed in the text. The text or the table should be revised. Also the preservation procedures for volatile analysis do not follow current EPA guidance, and must be revised.

32. Page 89, Paragraph 4.

All decontamination wastes must be containerized and placed in an containerized area designed for such purposes.

33. Page 89, paragraph 5.

The PID meter cannot be used to make a quantitative decision regarding waste characterization. The text should be revised. The text should also describe how the results of water analysis will be used to characterize subsurface saturated soils.

34. Page 90, paragraph 1.

The specific analytical methods and criteria used to determine if waste is hazardous must be identified. This section should explain how planned disposal complies with state and federal regulations.

35. Page 91-95, Tables 5-9.

The methods and parameters listed in these tables are not consistent with those listed in earlier tables and in the text. The EPA guidance document for preparation of sampling plans (identified in the general comments) should be reviewed and section 5 revised accordingly.